July 15, 2003

Mr. John Cunningham
Cunningham Quality Painting
2060 Yandes Avenue
Indianapolis, IN 46202

Dear Mr: Cunningham:

Re: Exempt Construction and Operation Status, E097-15009-00413

The application from Cunningham Quality Painting, received on August 6, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following powder coating operation, to be located at 2060 Yandes Avenue, Indianapolis, Indiana is classified as exempt from air pollution permit requirements:

(a) One (1) powder coating booth, using an electrostatic spray gun, coating metal parts, with a cyclone and baghouse that is integral to the process, and

(b) One (1) natural gas fired bake oven, with a maximum capacity of 2.0 MM Btu per hour.

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Pursuant to 326 IAC 6-3-2, the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

This exemption is the first air approval issued to this source.

Any change or modification which may increase the potential PM10 emissions to 5 tons per year or more from the equipment covered in this exemption must be approved by the Office of Environmental Services (OES) before such change may occur.

Sincerely,

originally signed by
John Chavez, Administrator

HMS
cc: File
Permits - Holly Stockrahm
Compliance - Matt Mosier
OAQ - Mindy Hahn

Indianapolis Office of Environmental Services

and

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for Exemption

Source Background and Description

Source Name:	Cunningham Quality Painting
Source Location:	2060 Yandes Avenue, Indianapolis, IN 46202
County:	Marion
Exemption No.:	E097-15009-00413
SIC Code:	3679
Permit Reviewer:	Holly M. Stockrahm

The Office of Environmental Services (OES) has reviewed an application from Cunningham Quality Painting relating to the construction and operation of one (1) electronic casing production operation described as follows:

(a) One (1) powder coating booth, using an electrostatic spray gun, coating metal electronic casings, with a cyclone and baghouse that is integral to the process, and

(b) One (1) natural gas fired bake oven, with a maximum capacity of 2.0 MM Btu per hour.

Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 6, 2001, with additional information received on January 2, 2003.

Emissions Calculations

The calculations of the potential to emit of PM from the powder coating operation includes a factor for the integral control of 99.1%. The product is collected and recycled into the powder coating booth. No hazardous air pollutants (HAPs) are emitted from this process.

Powder Coating PM = 16.6 lb/hr x 8760 hrs/year x ton/2000 lb x (1 - .991) = 0.65 tons/yr

Emissions from the 2.0 natural gas baking oven are on page 1 of Appendix A.

Total Potential Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	2.4	0.72
Particulate Matter (PM10)	2.4	0.72

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of the pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

County Attainment Status

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Marion County has been classified as attainment or unclassifiable for PM10, SO2, NOx and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	less than 1
PM10	less than 1
SO_2	less than 1
VOC	less than 1
CO	less than 1
NO_x	less than 1

(a) This existing source is an exemption because it is not one of the 28 listed source categories and no regulated pollutant is emitted at a rate of 1 tons per year or more.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)
This existing source is not subject to the Part 70 program.

Federal Rule Applicability

There are no New Source Performance Standards (40 CFR Part 60)(326 IAC 12) or National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR Part 63) applicable to this facility. The bake oven is not a boiler, so it is not subject to 40 CFR 60, Subpart Dc. The powder coating booth is not a source of VOCs or HAPs, so it is not subject to any 40 CFR 60 or 40 CFR 63 rules.

State Rule Applicability

326 IAC 5-1-2

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1 (Particulate Emission Limitations for Nonattainment Areas)

The source has a PM potential to emit of less than one hundred (100) tons per year, therefore, 326 IAC 6-1-2 does not apply.

326 IAC 6-3-2 (Particulate and Particulate Matter (PM) Emissions)

Pursuant to 326 IAC 6-3-2, the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

Conclusion

The construction of this electronic casing production operation will be subject to the conditions of the attached proposed **Exemption No. 097-15009-00413.**

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10

Company Name: **Cunningham Quality Painting**
Address City IN Zip: **2060 Yandes Avenue, Indianapolis, IN 46202**
CP: **E097-15009-00431**
Plt ID: **097-00413**
Reviewer: Holly Stockrahm
Date: July 1, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.0	17.5

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.1	0.1	0.01	0.9	0.0	0.2

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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